

# ALKYLPHENOLS BULLETIN

An Update from the Alkylphenols & Ethoxylates Research Council

September 28, 2007

*The Alkylphenols Bulletin periodically notifies manufacturers and users of alkylphenols and their derivatives of national and international developments of interest. For further information, please contact the APE Research Council at the address below.*

## **EPA RESPONDS TO SIERRA PETITION ON NONYLPHENOL AND NONYLPHENOL ETHOXYLATES**

On September 5, 2007, the US Environmental Protection Agency (EPA) published its response to a Citizens' Petition filed by the Sierra Club and various other groups on nonylphenol (NP) and nonylphenol ethoxylates (NPE) (72 Fed. Reg. 50954). The petition sought to prompt EPA to initiate rulemakings that would require extensive testing on NP and NPE and impose restrictions on the use of products containing these compounds.

With just a few exceptions, EPA denied most of the petitioner's requests:

- EPA did not agree that there was a need for most of the environmental and toxicological testing sought by the petitioners since the available data "do not provide a reasonable basis to conclude that NP or NPE pose an unreasonable risk to health or the environment." In its response, EPA cited its recent Water Quality Criteria for NP<sup>1</sup> that provides the framework for ensuring that these compounds remain below safe levels in the environment.
- EPA concluded that the call for testing of mixtures of NPE "to fill the gaps" regarding additive toxicity to aquatic organisms was not necessary.
- Similarly, EPA did not agree there was a need for mammalian/human health effects testing, concluding, "[A] combination of existing human and animal studies provides a reasonable understanding of the metabolism of NP in humans."
- EPA maintained that conventional chronic toxicity studies are adequate to address the mammalian and environmental toxicity of NPE surfactants and their metabolites - including any reproductive or endocrine effects.
- EPA rejected the specific call for an epidemiology study of industrial laundry workers. The Agency concluded that because of the "low volatility and the negligible dermal absorption of NP and NPE, these industrial laundry operations would not present significant exposure potential."

One area of agreement concerned the possible need for additional information to better assess effects to aquatic organisms from chronic exposure to "short-chain" NPE. However, due to the complexity of the issues, the Agency decided not to put forth a testing proposal but instead to

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<sup>1</sup> US EPA. (2005, December). Aquatic Life Ambient Water Quality Criteria - Nonylphenol. Final Report 822-R-05-005. <http://www.epa.gov/waterscience/criteria/nonylphenol/final-doc.pdf>.

solicit public comment on a variety of testing issues as part of an Advance Notice of Proposed Rulemaking (ANPR) likely to be issued in late 2008.

The Alkylphenol & Ethoxylates Research Council (APERC) is generally in agreement with EPA's response to the petition. APERC maintains that extensive health and environmental effects information already exists on NP and NPE and that this research demonstrates that current uses do not present a risk to human health or the environment. Concerning possible additional testing on short-chain NPE, significant information already exists on these compounds. Nonetheless, APERC welcomes the opportunity of discussing these issues and anticipates responding to the technical issues as part of its comments in response to the ANPR.

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